

Site: AK Steel Kansas City, Missouri Facility
Document: Final Corrective Measures Study Report for SWMUs 2, 3, 4, 5, 6, 7, 12, 13, 17, 24, and 33 and AOCs 1, 4, and 8
Date: June 16, 2016

#	Commenter / Reference	Section	Comment	Response
Draft CMS Report – July 2013				
1	USEPA Comment Letter dated 12/03/2013 Draft CMS Report	SWMU 12	USEPA stated concern with the selected remedy (Alternative 2 – Access Controls and Land Use Restrictions) for SWMU 12. USEPA requested that the CMS be revised to recommend a corrective measure alternative for SWMU 12 that meets the corrective measures evaluation criteria.	In 2014 a supplemental shallow soil investigation was performed by AECOM at SWMU 12 to better characterize the nature and extent of contamination in the 0- to 1-foot soil interval for purposes of ecological risk evaluation and CMS evaluation. The <i>CMS Report Addendum for AMOCO Landfarm (SWMU 12)</i> was submitted in August 2015 and approved by USEPA in September 2015. The <i>CMS Report Addendum for AMOCO Landfarm (SWMU 12)</i> was incorporated into the Final CMS Report.
2		SWMU 7	USEPA requested that corrective measures evaluation be completed for hot spots at SWMU 7. In May 2015, USEPA requested inclusion of SWMU 7 in an Interim Measures Work Plan for SWMUs 4, 7, 33, and AOC 8. In October 2015, USEPA requested interim measure implementation for SWMU 7 concurrently with SWMU 4 and AOC 8 activities.	Corrective measures evaluation for hot spots at SWMU 7 was completed and included in the Final CMS Report. Interim measures for SWMU 7 are included in the December 2015 Interim Measures Work Plan for SWMUs 4, 7, and 33 and AOC 8.
3		AOC 4, SWMU 6, and SWMU 24	USEPA requested that corrective measures evaluation be completed for hot spots identified in AOC 4, SWMU 6 and SWMU 24.	In 2014 an additional investigation was performed at the Former Tank Farm (AOC 4, SWMU 6, and SWMU 24) to address data gaps identified in the Draft CMS Report. This information was used for purposes of human health risk evaluation and corrective measures evaluation. Findings were presented in the <i>CMS Report Addendum for the Former Tank Farm</i> in July 2015. USEPA provided comments to this document in September 2015 (see below). <i>CMS Report Addendum for the Former</i>

Comment Incorporation Cross-Walk

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				<i>Tank Farm</i> and changes agreed to in response-to-comments was incorporated into the Final CMS Report.
4		Appendix O - HHRA	USEPA provided commentary on various sections of the HHRA. 4. Page 4-5, Section 4.4.1 – Ingestion rate for outdoor workers should be 100 mg/day.	Appendix O was updated to incorporate USEPA comments and additional investigations that were conducted based upon data gaps identified in the Draft CMS Report.
5			5. Page 4-5, Section 4.4.1 – A skin-to-skin adherence factor of 0.3 mg/cm ² should be used for evaluation of the construction worker.	
6			6. Table 4-1 – Verify Construction Worker exposure frequency.	
7			7. Table 5-1 – Verify reference doses for certain polynuclear aromatic hydrocarbons.	
8		Section 6.1 - SWMU 1 – RCRA Landfill	USEPA requested inclusion of SWMU 1 in area specific restrictions under the MoECA Covenant.	Section 6 and Section 7 – MoECA restrictions for SWMU 1 were added.
9		Section 6.2.2.2 – Economic Feasibility	Correct reference to Alternative 3. Alternative 3 was not evaluated.	Corrected.
10		Section 8, Page 8-3	Correct typo for 1E-04 to 1E06.	Corrected to 1E-04 to 1E-06.
11		SWMU 6 SWMU 17	USEPA requested that a sampling plan be developed for and submitted to complete characterization at SWMU 6 and SWMU 17.	Results of the investigations were submitted in the <i>Additional Sampling of Former Tank Farm and SWMU 17 Report</i> in October 2014. Results of soil investigation at SWMU 6 were incorporated into the <i>CMS Report Addendum for the Former Tank Farm</i> in July 2015. Additional characterization of SWMU 17 groundwater was completed in 2014-2015. Groundwater monitoring wells installed in the vicinity of SWMUs 17 and 33 were sampled. Results of these sampling

Comment Incorporation Cross-Walk

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				<p>activities were presented in quarterly groundwater monitoring reports submitted to USEPA, as follows:</p> <ul style="list-style-type: none">• <i>CMS Report Addendum for the Former Tank Farm</i> in July 2015• <i>September 2014 Groundwater Sampling Report SWMUs 17 and 33</i>• <i>December 2014 Groundwater Sampling Report SWMUs 17 and 33</i>• <i>March 2015 Groundwater Sampling Report SWMUs 17 and 33</i> <p>Current conditions and screening associated with SWMU 17 were updated in Section 2 of the Final CMS Report.</p>
CMS Report Addendum for Former Tank Farm (SWMU 6, SWMU 24, and AOC 4) – July 2015				
1	USEPA Comment Letter dated 9/15/2015 CMS Report	General HHRA Section 3.0 Appendix D	USEPA requested that the HHRA should include the groundwater pathway	Comment was rescinded in 10/27/2015 USEPA letter.
2	Addendum for SWMUs 6, 24, and AOC 4	General HHRA Section 3.0 Appendix D	General comments on the HHRA for Risk Assessment	Section 3 and Appendix O of the Final CMS report were updated to reflect changes as indicated in the October 8, 2015 Response-to-Comment Matrix submitted to USEPA via email.
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CMS Report Addendum for AMOCO Landfarm (SWMU 12) – August 2015				
1	USEPA Letter dated 9/15/2015 Approval of Revised Corrective Measures Study Report for SWMU 12	NA	Letter with USEPA approval of <i>CMS Report Addendum for AMOCO Landfarm (SWMU 12)</i>	The <i>CMS Report Addendum for AMOCO Landfarm (SWMU 12)</i> was incorporated into the Final CMS Report.

Comment Incorporation Cross-Walk

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Schedule for RCRA Corrective Action at AK Steel Site, 10/27/2015				
1	USEPA Letter dated 10/27/2015 Schedule for RCRA Corrective Action	General	USEPA requested that a Final CMS Report that includes SWMUs 2, 3, 4, 5, 6, 7, 12, 13, 17, 24, 33, and AOCs 1, 4, and 8 be submitted to the Agency, that incorporates the relevant sections of the draft July 2013 CMS Report submittal and the agreed upon revisions to the Draft July 2015 CMS Addendum Report for SWMUs 6, 24, and AOC 4.	The Final CMS Report was created and incorporated the following information: SWMU 7 corrective measure alternatives, SWMU 12 CMS Report, CMS Report Addendum for SWMUs 6, 24, and AOC4, SWMU 17 groundwater characterization, and updates to the HHRA in Section 3 and Appendix O.